



August 4, 2022

The Honorable Jerome Powell  
Chairman  
Board of Governors of the Federal Reserve System  
Attention: Ann E. Misback, Secretary  
20th Street and Constitution Ave. NW  
Washington, DC 20551  
RE: Community Reinvestment Act, Notice of Proposed Rulemaking, Docket Number R-1769, RIN 7100-AG29

The Honorable Michael Hsu  
Comptroller  
Office of the Comptroller of the Currency  
Attention: Comment Processing  
Chief Counsel's Office  
400 7th Street SW, Suite 3E-218  
Washington, DC 20219  
RE: OCC Docket ID OCC-2022-0002

The Honorable Martin Gruenberg  
Acting Chair  
Federal Deposit Insurance Corporation  
Attention: James P. Sheesley, Assistant Executive Secretary  
550 17th Street NW  
Washington, DC 20429  
Attention: Comments RIN 3064-AF81

Dear Chairman Powell, Comptroller Hsu and Acting Chair Gruenberg:

Alameda County Community Food Bank stands with our colleagues and partner organizations to support increasing access to responsible and responsive financial services that strengthen community members' ability to improve their financial stability and economic outcomes.

For more than 35 years, Alameda County Community Food Bank (ACCFB) has stood by our unwavering belief that food is a basic human right. We distribute millions of healthy meals every year and are on the forefront of new approaches to ending hunger and poverty. We work to build a stronger, more inclusive Community, where no person needs to worry about where their next meal will come from.

The global pandemic and current racial justice movement continue to highlight the need to invest resources and services in the well-being of people, communities, and neighborhoods aspiring to thrive amidst the most entrenched structural racism and economic barriers.

*"COVID is just unmasking the deep disinvestment in our communities, the historical injustices and the impact of residential segregation." – Dr. Camara Jones*



What we know...

"The idea that people of low-income experience shorter life spans and higher rates of chronic disease does not necessarily come as much of a surprise. So it's not shocking that living in a low-income neighborhood would also increase your chances of illness and premature death.

However, researchers from University Hospitals in Cleveland recently took it a step further, demonstrating that, among the many predictors of cardiovascular disease - one of them is whether your address falls in one of the neighborhoods that long ago was affected by discriminatory lending practices known as redlining.

'What's surprising to me is that every city that I've looked into, there is significant residential segregation. ... And no matter where you look, the relationship holds between the grading of the neighborhood (loan) risk and cardiometabolic health,' said the study's lead author, Dr. Sadeer Al-Kindi, a cardiologist at University Hospitals." [UH researchers find near century-old redlining discriminatory housing policies leave lasting legacy on modern day heart health](#)

"Compared to a white child born in the affluent Oakland Hills, an African American child born in East Oakland can expect to live 15 fewer years." – Source: Alameda County Vital Statistics files, 2010-2012; Black Lives Matter In Alameda County: A Data-Based Call To Action; Alameda County Public Health Department; Tammy Lee & Dr. Muntu Davis

Please consider the following:

**The need:**

- [Long lines are back at US food banks as inflation hits high](#)
- With the devastating economic impact of the pandemic—combined with existing factors like the Bay Area's high cost of living—we estimate that at least 1 in 4 residents is experiencing some level of food insecurity.
- Despite improvements (e.g., improving employment), several factors are contributing to sustained need:
  - Loss of federal/state support – e.g., monthly child tax credit
  - Housing instability
  - Inflation, Supply Chain Disruption, Gas Prices (*anecdotally we are hearing from clients that the cost of a trip to the grocery store is getting too expensive or folks preferring to walk to our Drive-Through distribution to save on gas*).

**The response:**

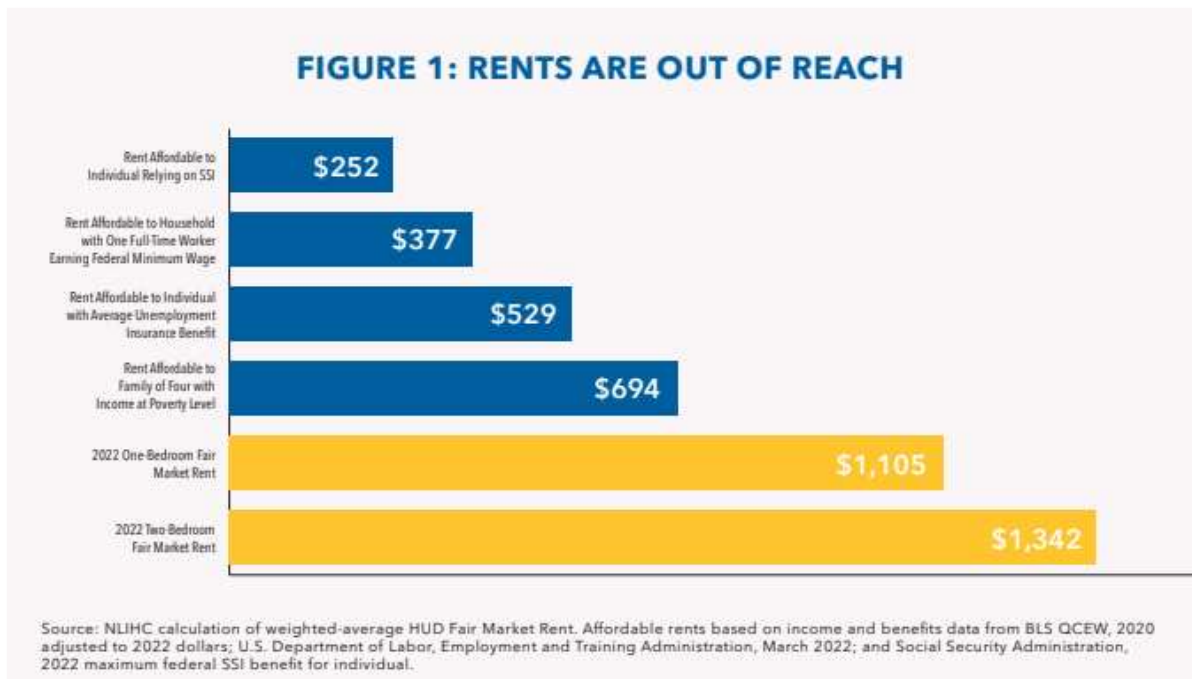
- We continue to provide 3 to 4 million meals worth of food every month. This year we will provide approximately 45 million meals worth of food (compared to 28 million before the pandemic).
- We have implemented additional programs during the pandemic to increase access to nutritious food resources, including our home delivery programs (we have purchased two new vans).



- The pandemic has further underscored the need for forceful legislative advocacy—both in the near term (to mitigate the effects of the pandemic) and long-term (to eradicate the root causes of hunger).

#### The Environment:

- [Alameda County Food Bank faces dual strain of rising demand, inflation](#)
- Our expenses more than doubled from FY19 (\$19.6 million) to this year (\$45 million)
  - We used to spend \$ 250,000 - \$300,000 monthly on purchased food – now we average \$1M - \$1.2M monthly.
  - Cost per pound on purchases has escalated from pre-pandemic \$0.65 to currently \$0.91 per pound for the entire year. Spike reflects investment in pre-made food kits, inflation (average 9-11% across the board) and commitment to BIPOC farmers (\$ 1.47 per pound for their produce).
  - We have increased our overall annual fuel budget by 25% in FY23.
- Meanwhile, we anticipate a decrease in funding this year (from private funding and decreasing/sunsetting government support) while maintaining programming to meet continued need.
- Recovery from emergencies and recessions has never been equitable. The recovery from the 2008 recession took 8-10 years, and we expect a protracted return from this event for community members who rely on food banks.
- According to National Low Income Housing Coalition's *Out Of Reach 2022* report. The hourly wage necessary to afford a two-bedroom FMR (fair market rent) in the Oakland-Fremont HMFA (HUD Metro FMR Area) is \$43.73.







The eradication of hunger and a more inclusive and just economic future for all community members will require more than just the distribution of groceries. We pledge to confront structural racism by advocating for policies, practices, and power structures that affirmatively further racial and economic justice and we invite our Community, partners, and you to join us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Regi Young".

Regi Young  
Executive Director  
Alameda County Community Food Bank